



Silicon Valley Community Media

1400 Terra Bella Ave.
Mountain View, CA 94087

August 7, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming
Guides and Menus, MB Docket No. 12-108, Notice of Proposed
Rulemaking (FCC 13-77)*

Dear Commissioners:

Mountain View Community Television(KMVT) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Mountain View Community Television (KMVT) is a local non profit community media center that has been providing service to Mountain View for 32 years. We provide media education, hands on training and promote civic engagement. We have over 40 locally independent producers who produce over a thousand hours of programming a year to be carried on our channels. KMVT community programming is available to in Mountain View, Los Altos and Cupertino California, via Comcast and also AT & T U-Verse. Our programming is available to approximately to 165,000 cable subscribers. Our AT & T U-Verse coverage is throughout the bay area. We also provide the local coverage of the government channel for Mountain View, Los Altos, Sunnyvale and Foster City.

We are committed to accessibility for all members of our community and want to present programs such as Democracy Now that includes closed captioning for deaf and hearing impaired viewers. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast and AT&T U-verse, does not provide a label or symbol indicating that these programs have closed captions. Consumers also can not record the programs from their DVR's to watch later based on the program listing being generic.

As part of our ongoing efforts to support "local voices through community media" we gather and share metadata including title, duration and other pertinent information about local noncommercial programs that we air on cable access channels and otherwise distribute. However, the program guide listings of our cable operator are inadequate to inform local

viewers of local programs. In our view, the program listing guide information at present is inadequate to meet the accessibility goals of the Twenty First Century Communications and Video Accessibility Act of 2010 (CVAA).

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Our community is also served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number 99 and you must type in Mountain View, with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to "see" and navigate. In our area, AT&T has a span of communities listed in its guide from San Francisco Bay Area to the entire south peninsula, on its "channel 99" PEG application. Noting that channel 99 is not listed on the web channel guide at all. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually navigate a menu of different local community jurisdictions, find and press or type in the correct city, and then after that, visually navigate a sub-menu of different PEG channels, and find and press the correct one, to reach our PEG channel. Moreover, AT&T PEG product's lack of a truly effective "last channel" function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another.

In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, our PEG channels on AT&T's U-verse system.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

Shelley Wolfe

Executive Director

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